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02/26/03

Washington Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Report

Site : Longview Fibre Co. RCRA ID#: WAD 009 282 161
Inspection Date: February 26, 2003
Site Contacts: Belton Rogers
Phone: (206) 762-7170
Site Location: 5901 E. Marginal Way S.
Seattle, WA 98134
At This Site Since: 1950's SIC#: 2653
Generator/Site Status: Small Quantity Generator

Ecology

Lead Contact: Victoria Sutton Phone: (425) 649-7277 FAX : (425) 649-7098
Other Representatives: Byung Maeng
Report Date: April 18, 2003
Report By: Victoria Sutton

Victoria Sutton

(Signed)

4-21-03

(Date)

Facility Background:

Longview Fibre Corp. manufactures corrugated cardboard boxes for the food and wine industry. At this plant the boxes are prepared and printed with water based ink. The main waste stream is dust from the cardboard which is disposed into the solid waste dumpster. The facility shows that they do not generate regulated dangerous waste on their Annual Dangerous Waste Reports.

Inspection Summary:

We arrived on site at 9:35 a.m. and met with Belton Rogers, the Plant Superintendant. The environmental contacts, Tom Craig and Jim Mantell, were both out of the office. We began with an opening conference to discuss environmental issues at the plant. The site has a stormwater permit and Belton is working on the required monitoring plan at the present time. A clean air inspector was recently inspecting the plant to check on the air quality permit compliance. An on-site wastewater treatment plant treats wastewater generated inside the plant and recirculates a large portion of it back into the adhesive used to form the boxes. Some treated wastewater is discharged to the sewer system under a discharge permit. Belton has also been working on this year's EPCRA report for the storage of diesel and sodium hydroxide for the wastewater treatment system.

Belton lead us on a tour of the plant beginning with some used shop towel collection containers. The containers were of the proper type and were kept closed, but were not labeled "Contaminated Shop Towels Only" as required for them to be exempt from the dangerous waste regulations; however it appears that the towels would not contain any hazardous waste. The printing machines are cleaned only with soap. No solvents are used in the plant.

In several locations there were grates on the floor to contain any liquids and direct them to the wastewater treatment area.

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In several locations there were grates on the floor to contain any liquids and direct them to the wastewater treatment area.

Near the wastewater treatment plant and within a secondary containment berm, the waste oil from the machines is stored in a large bin. It is properly labeled as "used oil only" and the funnel in the bung was padlocked. The used oil is picked up by Emerald Petroleum. Floor dry from spill cleanup is non-hazardous and disposed in the dumpster.

The sodium hydroxide is also stored within the bermed area in a bin. Recently the pH readings of the wastewater prior to treatment have been recorded. The pH was measured at between 8 and 10. Belton said that the company won an award for their wastewater recirculating system.

We went outside to the diesel storage area. A large diesel tank is stored within a fence, under cover, and with containment. Next to it was a large dumpster containing the filter cake from the wastewater treatment system. Belton stated that the filter cake has been tested and the company has the approvals to dispose of it into the dumpster since it is not hazardous waste.

A Safety Kleen parts washer is located in the maintenance area. The solvent is rarely changed. Safety Kleen changes the parts washer solvent on an on-call basis.

We reviewed the site records. The annual dangerous waste reports for 2000 and 2001 indicate that no regulated waste was generated. Safety Kleen manifests for the parts washer solvent were available for 1995 and 1996, but no parts washer solvent has been generated since then. The used solvent may be being managed under Safety-Kleen's continued use program so that no waste is generated.

The inspection concluded at 10:35 a.m.

Compliance Problems

The following conditions identified during the inspection on February 26, 2003, were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the citation from the regulations, (2) the specific observations from the inspection that highlight the problem, and (3) the corrective measures needed to fix the problem and achieve compliance. On the last page(s) of this report is a 'Compliance Certificate' which again lists these compliance citations and directives in a table. That certificate also lists the deadlines for the corrective measures to be completed. The certificate explains how to complete the form and return it to the Department of Ecology.

- 1) No violations were observed during this inspection.